

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**Valtrus Innovations Ltd.**

**Plaintiff**

**v.**

**SAP America, Inc. and SAP, SE.**

**Defendants.**

§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 2:24cv21**

**JURY TRIAL DEMANDED**

**DECLARATION OF KALPANA KUMAR IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR INTRA-DISTRICT  
TRANSFER**

I, Kalpana Kumar, declare as follows:

1. I make this declaration based upon my personal knowledge and my investigation of the facts below. If called as a witness, I could and would testify competently to the matters set forth herein. I submit this declaration in support of Plaintiff's Opposition to Defendants' Motion for Intra-District Transfer.

2. I currently reside at 705 Freedom Lane, Aubrey, Texas, and have done so since May 2020. Prior to that time, I was a New Jersey resident, and had been so for over two decades.

3. I am a founder and Chief Operating Officer of Patent Platform Services LLC ("PPS"). PPS is a Delaware limited liability company with a principal place of business in Frisco, Texas. One of my responsibilities is to manage the PPS relationship with Valtrus, including active involvement in and overall management of all activities PPS performs to support Valtrus's licensing efforts.

4. PPS has a contractual agreement with Key Patent Innovations, Ltd. ("KPI") to provide patent licensing services to KPI and its subsidiaries, one of which is Valtrus Innovations

Limited (“Valtrus”).

5. PPS has one corporate office which is located at 7460 Warren Parkway, Suite 100, Frisco, Texas 75034.

6. I understand that SAP identified Ms. Amiee Pipes and Mr. Randy Mishler in its motion to transfer. Neither of those individuals substantively works on Valtrus matters.

7. To my knowledge, no former PPS employee resides in or near the Sherman Division.

8. PPS’s documents are hosted on third-party Microsoft servers using SharePoint; Valtrus documents are hosted on a different Sharepoint, which is managed by Angela Quinlan. Valtrus only provides PPS access to documents on the Valtrus-maintained Sharepoint as needed to facilitate PPS’s ability to represent Valtrus’s licensing interests.

9. I am willing to travel to the Marshall Division for trial in this matter. Should I be required to attend trial, I would not find it inconvenient to do so. While I do not anticipate any other Texas-based PPS employees would be called as trial witnesses, if so called, PPS will not object to and will facilitate the attendance of such witnesses to attend a trial in Marshall.

\* \* \*

I declare under penalty of perjury under the laws of the United States of America that the forging is true and correct to the best of my knowledge.

Executed on May 30, 2024

Kalpana Kumar  
Kalpana Kumar